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January 17, 2025


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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/21/2025The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007**Re: *United States v. Ferdinand Quinones*, 24 Cr. 364 (MKV)**

Dear Judge Vyskocil:

Defense counsel writes jointly with the Government to provide a status update in the above-captioned case. The parties are continuing to engage in good-faith discussions regarding a potential resolution of this matter, but have not yet reached a resolution. Defense counsel is expected to receive a plea agreement within the next one to two weeks that he will share with Mr. Quinones. The parties therefore respectfully request that the Court adjourn the forthcoming status conference to a date convenient for the Court on or after February 24, 2025, to permit the parties additional time to reach a potential resolution of the above-captioned matter.

The parties further request that time be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from January 23, 2025, through the adjourned date of the conference. The parties respectfully submit that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow time for a potential pretrial resolution of this case.

GRANTED. The conference is ADJOURNED to February 27, 2025 at 11:00 a.m. All time is excluded until that date. The parties shall submit either a signed plea agreement or a joint status letter one week before the conference.

Date: Jan. 21, 2025
New York, New York

Mary Kay Vyskocil
United States District Judge

Sincerely,

//s//David Jason Cohen//s//
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